

Attorneys for PG&E Shareholders

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 || In re:

14 || PG&E CORPORATION

Bankruptcy Case No. 19-30088 (DM)

15 - and -

Chapter 11

16 ||| PACIFIC GAS AND ELECTRIC
COMPANY,

(Lead Case) (Jointly Administered)

18 || Debtors.

**NOTICE OF SUBPOENA ISSUED TO
BROWNGREER PLC**

- 20 Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “Petition Date”), PG&E
2 Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the “Utility”), as debtors
3 and debtors in possession (the “Debtors”) in the above-captioned chapter 11 cases each filed a
4 voluntary petition for relief under chapter 11 of title 11 of the United States Code with the United
5 States Bankruptcy Court for the Northern District of California (San Francisco Division). Certain
6 owners of common stock of PG&E Corporation (the “PG&E Shareholders”)¹ hold, disclosable
7 economic interests in relation to the Debtors and have appeared in the chapter 11 cases in
8 connection with those interests.

9 **PLEASE TAKE FURTHER NOTICE** that on July 30, 2019, counsel for the PG&E
10 Shareholders issued and intend to serve a subpoena to produce documents, information, or objects
11 (the “Subpoena”) on the Custodian of Records of BrownGreer PLC. A copy of the Subpoena is
12 attached hereto as Exhibit 1. The items requested to be produced in the Subpoena, as described
13 in Exhibit A to the Subpoena, relate to the following motions filed in the chapter 11 cases: (i) the
14 Amended Motion of the Official Committee of Tort Claimants for Relief from Automatic Stay to
15 Permit State Court Jury Trial of 2017 Tubbs Wildfire Claims [ECF 2904], filed by the Official
16 Committee of Tort Claimants on July 9, 2019; (ii) the Motion of the Ad Hoc Group of
17 Subrogation Claim Holders for Relief from the Automatic Stay [ECF 2863], filed by the Ad Hoc
18 Group of Subrogation Claim Holders on July 3, 2019; and (iii) the Debtors’ Motion Pursuant to
19 11 U.S.C. §§ 105(a) and 502(c) for the Establishment of Wildfire Claims Estimation Procedures
20 [ECF 3091], filed by the Debtors on July 18, 2019.

21 **PLEASE TAKE FURTHER NOTICE** that copies of each pleading identified herein can
22 be viewed and/or obtained: (i) by accessing the Court’s website at <http://www.canb.uscourts.gov>,
23 (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco,
24 CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC, at

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¹ The PG&E Shareholders are identified in the *Second Amended Verified Statement Of Jones*
26 *Day Pursuant To Federal Rule Of Bankruptcy Procedure 2019* [ECF 3158]. The PG&E Shareholders
27 are acting in their individual capacities but authorized the filing of this single submission for the
28 purpose of administrative efficiency. Each of the PG&E Shareholders is expressing its independent
views, and counsel does not have the actual or apparent authority to obligate any one entity to act in
concert with any other entity with respect to PG&E equity securities. The PG&E Shareholders have
not agreed to act in concert with respect to their respective interests in PG&E equity securities.

1 https://restructuring.primeclerk.com/pge or by calling (844) 339-4217 (toll free) for U.S.-based
2 parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com.
3 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

4 Dated: July 30, 2019

JONES DAY

6 By: /s/ Joshua M. Mester
7 Joshua M. Mester

8 *Attorneys for PG&E Shareholders*

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